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17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 \* \* \*

20 **James M. Herndon,**

21 CASE NO.: 2:19-cv-00018-GMN-NJK

22 Plaintiff,

23 vs.

24 **City of Henderson**, a political  
25 subdivision of The State of Nevada; **Sgt.**  
26 **M. Gillis**, individually and in his official  
capacity as a police officer; **Officer L.**  
27 **Good**, individually and in his official  
capacity as a police officer; **Officer A.**  
28 **Nelson**, individually and in his official  
capacity as a police officer; **Officer D.**  
Defendants.

29 **Nerbonne**, individually and in his official  
capacity as a police officer; **Officer D.**  
30 **Russo**, individually and in his official  
capacity as a police officer; **Officer E.**  
31 **Vega**, individually and in his official  
capacity as a police officer; Doe Officers  
32 I through X, inclusive and Roe Entities I  
33 through X, inclusive

34 **Second Stipulation and Proposed**  
35 **Order to Extend Briefing**  
36 **Deadlines (ECF # 54)**



1 Plaintiff, James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and  
2 Matthew G. Pfau, Esq.. of H & P LAW, and Defendants, City of Henderson, Sgt. M.  
3 Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and  
4 Officer E. Vega through their counsel of record, Nicholas G. Vaskov, Esq. and Nancy  
5 D. Savage, Esq. of CITY ATTORNEY'S OFFICE, do hereby stipulate and agree to  
6 Extend the due dates of Plaintiff's Opposition to Defendant, City of Henderson's  
7 Motion for Summary Judgment and Defendant's Reply in Support to Defendant, City  
8 of Henderson's Motion for Summary Judgment.

9 Currently, Plaintiff's Opposition is due December 2, 2020. Plaintiff and Defendant  
10 agree to Extend the Deadline for Plaintiff to file his Opposition to December 9, 2020.  
11 and for Defendant to file their Reply in Support to January 18, 2021. The extensions  
12 are being requested in good faith and not for the purpose of delay. The extensions  
13 are being requested as the issues to be briefed are extensive and complicated.  
14 Plaintiff's co-counsel, Micah Echols, Esq. of CLAGGETT & SYKES, had a recent  
15 COVID-19 outbreak in his office, and as such, they have been closed for in person  
16 operations. This setback unfortunately delayed Plaintiff's efforts to oppose this  
17 motion. The parties also anticipate the end of the year holidays will further  
18 complicate the briefing schedule, necessitating a further extension for Defendants  
19 to file their Reply.

20

21 **Stipulation**

22 It is hereby STIPULATED between James Herndon, through his counsel of record,  
23 Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq.. of H & P LAW, and Defendants,  
24 City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D.  
25 Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record,  
26 Nicholas G. Vaskov, Esq. and Nancy D. Savage, Esq. of CITY ATTORNEY'S OFFICE,  
27 to Extend Breifing Deadlines Related to Defendant, City of Henderson's Motion for  
28 Summary Judgment, ECF # 54.



1 IT IS FURTHER STIPULATED that Plaintiff's Opposition to Defendant, City of  
2 Henderson's Motion for Summary Judgment must be filed by December 9, 2020.

3 IT IS FURTHER STIPULATED that Defendant, City of Henderson's Reply in  
4 Support of Motion for Summary Judgment must be filed by January 18, 2021.

5 WHEREFORE, the parties respectfully request that the Court enter its order  
6 extending deadlines as described in the stipulation above.

7 DATED this 1st day of December 2020.  
8

9 Respectfully submitted by:

10 H & P LAW

11 /s/ Marjorie Hauf, Esq.

12 Marjorie L. Hauf, Esq.

Nevada Bar No.: 8111

13 Matthew G. Pfau, Esq.

Nevada Bar No.: 11439

14 Attorneys for Plaintiff,  
James M. Herndon

Approved as to form and content:

CITY ATTORNEY'S OFFICE

/s/ Nancy Savage, Esq.

Nicholas G. Vaskov, Esq.

Nevada Bar No.: 8298

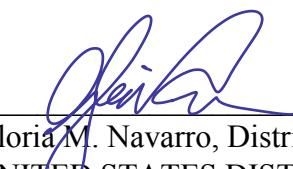
Nancy D. Savage, Esq.

Nevada Bar No.: 392

15 Attorneys for Defendants,  
16 *City of Henderson, Sgt. S. Gillis, and*  
17 *Officers L. Good, A. Nelson, D.*  
18 *Nerbonne, D. Russo, and E. Vega*

19 IT IS SO ORDERED.

20 Dated this 1 day of December, 2020

21   
22 \_\_\_\_\_  
23 Gloria M. Navarro, District Judge  
24 UNITED STATES DISTRICT COURT